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1	HOWARD & HOWARD ATTORNEYS, PLLC Todd E. Kennedy (NSBN 6014)		
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3	Telephone: (702) 257-1483 Facsimile: (702) 567-1568		
4	tek@h2law.com		
5	Attorneys for Defendants Anthony Desa and Jane Desa		
6			
7	UNIITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	UNITED STATES OF AMERICA,	Case No. 2:24-cv-1993-JCM-NJK	
10	Plaintiff,		
11	v.	STIPULATION AND ORDER TO CONTINUE DEADLINE FOR	
12	ANTHONY DESA, INDIVIDUALLY AND AS TRUSTEE OF THE ERBIN TRUST;	OPPOSITIONS TO MOTIONS	
13	JANE DESA; ASSET FORECLOSURE SERVICES, INC., AS TRUSTEE OF THE	[FIRST REQUEST]	
14	METROPOLITAN LIFE INSURANCE		
15	WATER DISTRICT; REPUBLIC SILVER		
16	STATE DISPOSAL; RICHARD FOLMER; FREEMAN, FREEMAN & SMILEY, LLP;		
	CLARK COUNTY, NEVADA,		
17	Defendants. RICHARD FOLMER,		
18	Cross-claimant,		
19	ANTHONY DESA; JANE DESA,		
20	Defendants.		
21			
22	Richard Folmer, <i>pro se</i> , and Anthony and	d Jane Desa, through their counsel, stipu	
23	request as follows:		

late and request as follows:

Anthony and Jane Desa filed a Motion to Dismiss the Cross-claims asserted by Richard Folmer on March 21, 2025. ECF. No. 23. In connection with ECF No. 23, Crossdefendants filed a Motion to Seal/Redact to preserve the confidentiality of the ERBIN Trust

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1	Agreement. ECF No. 26. The current due date for oppositions is April 4, 14 days after the filing		
2	of the motions.		
3	2. Mr. Folmer is presently representir	ng himself. He has advised that he has medical	
4	issues that require a substantial amount of his time	e. Accordingly, he is presently actively seeking	
5	to retain counsel to assist him in this matter, and	has requested a modest extension of time to the	
6 7	briefing.		
8	3. Accordingly, the parties to the Cr	oss-claims stipulate that Mr. Folmer's time to	
9	respond to the Motion to Dismiss [ECF No. 23] and the Motion to Seal [ECF No. 26] may be		
10	extended ten (10) days to April 14, 2025.		
11		sion of time to file on apposition brief	
12	4. This is the first request for an exten	sion of time to file an opposition brief.	
13	HOWARD & HOWARD ATTORNEYS, PLLC	RICHARD FOLMER	
14	/s/ Todd E. Kennedy, Esq. Todd E. Kennedy (NSBN 6014)	/s/ Richard Folmer Richard Folmer, pro se.	
15	3800 Howard Hughes Pkwy., Suite 1000 Las Vegas, NV 89169	19200 Von Karman #600 Irvine, CA 92612	
16	Telephone: (702) 257-1483 Facsimile: (702) 567-1568	Tel: 949-295-1088 richardfolmer@yahoo.com	
17	tek@h2law.com Attorneys for Defendants Anthony Desa		
18	and Jane Desa		
19 20	U.S. DEPT. OF JUSTICE	LAS VEGAS VALLEY WATER DISTRICT	
21	/s/ Tijuhna Green, Esq. Tijuhna Green, Esq.	/s/ Jim Smyth, Esq. Jim Smyth, Esq.	
22	U.S. Dept. of Justice, Tax Division Ben Franklin Station	Las Vegas Valley Water Dist.	
23	P.O. Box 683	1001 South Valley View Blvd. Las Vegas, NV 89153	
24	Tel: 202-616-3340 Fax: 202-307-0054	Tel: 702-258-7166 jim.smyth@lvvwd.com	
25	<u>Tijuhna.a.green@usdoj.gov</u>	Attorney for Las Vegas Valley Water Dist.	
26	Attorney for USDOJ		
27			

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1	GHIDOTTI BERGER LLP	CLARK COUNTY DISTIRCT ATTORNEY
2	/s/ Michael R. Brooks, Esq.	/s/ Sarah Schaerrer, Esq.
3	Michael R. Brooks, Esq. 7251 w. Lake Mead Blvd., #470	Sarah Schaerrer, Esq.
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6	Mbrooks@ghidottiberger.com	Fax: 702-382-5178
7	Attorneys for Asset Foreclosure Services, Inc	sarah.schaerrer@clarkcountydanv.gov <i>Attorney for Clark County, NV</i> .
8	KACZMAREK & JOJOLA, PLLC	
9	/s/ Derek W. Kaczmarek, Esq.	
10	Derek W. Kaczmarek, Esq. 10229 N. 92 nd . St. Ste. 103	
11	Scottsdale, AZ 85258 Tel: 602-899-6200	
12	Fax: 602-899-9339	
13		
14	IT IS SO ORDERED:	
15		
16	Xellus C. Mahan	
17	UNITED STATES DISTRICT JUDGE	
18	DATED:April 4, 2025	
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